From: Casso, Ruben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E33DF0ABBBF049959E9100E556C7E634-CASSO, RUBEN]

Sent: 6/24/2020 3:23:41 PM

To: Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]

CC: Riddick, Nia [Riddick.Nia@epa.gov]

Subject: Revised draft EtO plan with updated emission numbers including emission events

Attachments: EtO Technical Assessment Options DRAFT 6-23-20.docx; DRAFT TX facilities (3) - 2017-2018 El-Event Reports 6-23-

20.docx; DRAFT LA facility 2017 emission event reports .docx

Summary emission event data below and in revised draft plan. Details on emission events currently available online also attached.

2014 NATA and 2017 Emission Inventory and 2018 TRI and EI reporting updates DRAFT June 23, 2020

Reviewed 2017 and 2018 state El's online as well as emission event reports specific to EtO. Emission event emissions and revised totals in red.

See table below. We'll need to ask the states for more recent data and to help us confirm or correct any EtO emissions data available online.

Facility*	2014	2014	2017 EI EtO	%	2018 TRI	%	2018 EI
	NATA EtO	NATA	emissions	Difference	Emissions	Difference	
	emissions	Risk	(lbs)	from 2014	(lbs)	from 2014	
	(lbs)						
BCP Ingredients	5,003	2,539	4,260	-14.9%	48	-99%	No EI
St. Gabriel, LA							report
Union Carbide	20,860	1,680	11,159 +174	-46%	7,922	-62%	7,822
Hahnville, LA			= 11,333				
Huntsman	21,552	1,456	12,053 + 596	-41%	42,822	+98%	12,470 +
Port Neches, TX			= 12,649				30,195 =
							42,666*
Eastman	14,828	1,355	10,740 +	-13%	7,580	-49%	7,337 +59 =
Chemical,			2,140 =				7,396*
Longview, TX			12,880*				
Taminco	2,299	1,330	1,606	-30.1%	160	-93%	160
Chemical							
(Eastman Corp.),							
St. Gabriel, LA							
Sasol	12,640	841	16,449	+30.1%	2,237	-82%	2,237
Westlake, LA							
Evonik (formerly	3,222	831	2,494	-22.6%	No 2018 TRI	-46%	1,747
Air Products)					report found		
Reserve, LA							
Shell Technology	919	291	640.4		No 2018 TRI	-29%	649.6
Center, Houston,				-30%	report found		
TX							
Midwest	15,738	219	14,845	-5.7%	15,112	-4%	No EI
Sterilization,							report
Laredo, TX							

^{*}event emissions added

Other Considerations

¹ EPA/DOJ Supplemental Environmental Project (SEP) negotiations may have impacted Union Carbide

² Midwest Sterilization is geographically isolated with no obvious residential population nearby